

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF MICHIGAN
SOUTHERN DIVISION

UNITED STATES OF AMERICA,

Plaintiff,

vs.

LAWRENCE GERARD NASSAR,

Defendant.

No. 1:16-CR-242

Hon. Janet T. Neff
United States District Judge

SUPERSEDING INDICTMENT

_____/

The Grand Jury charges:

COUNT 1

(Receipt and Attempted Receipt of Child Pornography)

Between on or about September 18, 2004 and December 1, 2004, in Ingham County, in the Southern Division of the Western District of Michigan, the defendant,

LAWRENCE GERARD NASSAR,

did knowingly receive and attempt to receive child pornography that had been shipped and transported in interstate and foreign commerce by any means, including by computer; that is, the defendant received and attempted to receive, via the Internet, images of child pornography, including, but not limited to, one or more of the following:

1. Nelya095.jpg;
2. 060.jpg;
3. 05.jpg;
4. 30.jpg;
5. 44.jpg;
6. isa-029-069.jpg.

18 U.S.C. § 2252A(a)(2)(A) and (b)(1)
18 U.S.C. § 2256(8)(A)

COUNT 2

(Possession of Child Pornography)

Between on or about February 6, 2003 and September 20, 2016, in Ingham County, in the Southern Division of the Western District of Michigan, the defendant,

LAWRENCE GERARD NASSAR,

did knowingly possess one or more computer disks, electronic files, and other materials that contained thousands of images of child pornography, including, but not limited to, one or more of the following:

- | | |
|---------------------------------------|--------------------|
| 1. pedo - vicky_10_yr_old_orgasm.mpeg | 6. pthc - Sara.jpg |
| 2. lsm04-03-082.jpg | 7. ?37.jpg |
| 3. St_0709.jpg | 8. ?41.jpg |
| 4. S_funny0019.jpg | 9. ?45.jpg |
| 5. pthc - kelly13 young girl.jpg | 10. ?06.jpg |

Such images had been shipped and transported using any means and facility of interstate commerce by any means, including by computer, and were produced using materials that had been mailed and shipped and transported in and affecting interstate and foreign commerce by any means, including by computer, including, but not limited to, an AcomData hard drive, which was constructed with components manufactured outside the State of Michigan. The images of child pornography possessed included images that involved a minor who had not attained 12 years of age.

18 U.S.C. § 2252A(a)(5)(B) and (b)(2)

18 U.S.C. § 2256(8)(A)

COUNT 3

(Destruction and Concealment of Records and Tangible Objects)

Between on or about September 19, 2016, and September 20, 2016, in Ingham County, in the Southern Division of the Western District of Michigan, the defendant,

LAWRENCE GERARD NASSAR,

knowingly altered, destroyed, mutilated, concealed, and covered up any record, document, and tangible object with the intent to impede, obstruct, and influence a contemplated investigation of any matter within the jurisdiction of the Federal Bureau of Investigation (FBI), an agency of the United States.

Specifically, the defendant caused a third-party vendor to permanently delete and destroy all images, records, documents, and files contained on the hard drive of a laptop computer, and the defendant threw in the trash a number of external hard drives. At the time the defendant took these actions, he contemplated an investigation into, among other things, his possession of child pornography, his receipt and attempted receipt of child pornography, and his sexual exploitation and attempted sexual exploitation of children.

18 U.S.C. § 1519

A TRUE BILL



GRAND JURY FOREPERSON

ANDREW BYERLY BIRGE
Acting United States Attorney



SEAN M. LEWIS
Assistant United States Attorney